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Elkem Metals Company

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August 6, 1985

RECEIVED

AUG 7 (1585)

D J HANSEN

Dr. D. J. Hansen Umetco Minerals P. O. Box 579 Niagara Falls, New York

Subject: Decontamination - 169 Building

Dear Don:

Elkem is proceeding to make rearrangements in 169 Building prior to installation of the new Alpine Mill in September.

Umetco made extensive efforts months ago to clean up the building and remove all traces of asbestos and radioactive materials. Following this effort, you performed some tests that indicated base levels of airborne asbestos fibers and background radioactivity levels.

There appear to be a few loose ends on both of these subjects. To my knowledge the Cerium 137 radioactive level indicator on the shaft furnace is the only known radioactive concern left in 169 Building. You had indicated that this source and the spare for it, in the 143 Building button room, would be removed from the site, probably with the removal of the shaft furnace. The other shaft furnace concern was for some (3 visible) PCB-containing capacitors that are part of the furnace control system. You would presumably remove these from the site when the furnace is disassembled.

We went thru the PCB capacitor removal procedure last January disposing of 55 capacitors thru CECOS. The paperwork and costs seem excessive but it is a convenient solution.

The asbestos concern is for fibers that are now in place that could become airborne thru vibration or ventilation. OSHA has a concern for airborne fibers in work areas with continuous exposure or one time concentrations resulting from cleanup activities. Since Elkem has no intention of doing any asbestos work in 169 Building, we are after some documentation as to what Blair Ingalls actually completed in the cleanup and is there any base level data that we could cite if we have future inspections.

In summary then, could you please provide the following documentation:

(1) Some written description of Ingalls' cleanup procedures and the airborne fiber readings following removal of all of the asbestos. Presumably the building was not washed down and dust on all of the building structurals. crane ports, etc. was not vacuumed. At some future date, if OSHA inspects, can we show them a base line of readings for April 1985?

(2) Similarly can we have some written certification of what radioactive materials were present, when they were removed and any base line data as of April 1985, or at the completion of the shaft furnace move, indicating that the background was low and there were no significant hot spots.

Very truly yours,

RAC:jk

Copies: T. J. Kagetsu

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